

DEPARTMENT OF AGING

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May 13, 2008

Mary Goblirsch, Director
Area Agency on Aging Division
Department of Social Services
County of Monterey
713 La Guardia Street, Suite A
Salinas, California 93901

Dear Ms. Goblirsch:

Enclosed is the final report issued by the California Department of Aging (CDA), which summarizes the onsite comprehensive assessment of the Area Agency on Aging (AAA) Division, Department of Social Services, County of Monterey, for Planning and Service Area (PSA) 32. CDA staff conducted the assessment from January 14-17, 2008. The purpose of the assessment was to review the Administrative, Fiscal, and Program components of your direct and contracted Title III/VII, Title III E, and Community-Based Services Programs (CBSP).

The format of the report contains four specific sections that include: Recap/Overview of Monitoring Visit, Best Practices or Models of Service Delivery, Technical Assistance, and Findings and Corrective Actions.

On March 21, 2008, CDA sent the AAA a Report of Findings and Corrective Actions and a Corrective Action Plan (CAP) in an electronic format requesting the AAA, within 30 days, to identify the actions it planned to implement to ensure substantial compliance with all statutory language and program standards that were identified in the CAP. We are currently reviewing the submitted CAP and will notify the AAA when the review is complete, if any additional actions are required, or if the CAP is approved as submitted.

We would like to thank you, your staff, the Chair of the Governing Board, and the Chair of the Advisory Council for all the assistance and hospitality during our visit. CDA will conduct a comprehensive assessment of your agency again in 2012.

In the meantime, please do not hesitate to contact us should you or your staff have questions regarding the administration of programs funded through the Older Americans Act or Older Californians Act.

Sincerely,

Geri Baucom, Acting Policy Manager
Monitoring Protocol Team

Enclosures

cc: Fernando Armenta, Chair, Governing Board

Robert Petty, Chair, Advisory Council

Lynn Daucher, Director
California Department of Aging

Edmond P. Long, Acting Deputy Director
Long-Term Care and Aging Services Division

Elliott Hochberg, Policy Manager, AAA-Based Team A

**AREA AGENCY ON AGING DIVISION
DEPARTMENT OF SOCIAL SERVICES
COUNTY OF MONTEREY
PSA 32**

**REPORT OF THE
COMPREHENSIVE ASSESSMENT VISIT**

**Conducted by the
California Department of Aging
January 14-17, 2008**

CONTENTS

- **Recap/Overview of Monitoring Visit**
- **Best Practices or Models of Service Delivery**
- **Technical Assistance**
- **Findings and Corrective Actions**

The onsite assessment of the Area Agency on Aging (AAA) Division was conducted by staff of the California Department of Aging (CDA) from January 14-17, 2008. Staff present were Geri Baucom, Acting Policy Manager, and Coach, Fiscal and Contracts; and Aging Program Specialists Sandi Hartsock and Tasha Wilson (Administrative); Denny Wight (Title III B Supportive Services); Scott Crackel (Title III B Information and Assistance and Disaster Preparedness); Joel Weeden (Title III E Family Caregiver Support Program); Barbara Estrada, R.D., and Margaret Stahler, R.D., (Title III C Elderly Nutrition Program, Title III D Disease Prevention and Health Promotion, Brown Bag, and Senior Farmers' Market Nutrition Program); Steve Miars (Health Insurance Counseling and Advocacy Program); and Kathleen Hendrickson (Linkages, Adult Day Services, and ADCRC). CDA staff monitored administrative, fiscal, and specific program standards required by the Older Americans Act (OAA) and Older Californians Act (OCA).

This report includes:

- Recap of the standards monitored during the visit.
- Recognition of best practices or models of service delivery discovered during the monitoring visit that will be shared with the aging network by posting a notice on CDA's website.
- Documentation of the technical assistance on specific program standards provided to the AAA during the monitoring visit.
- Findings and Corrective Actions.

RECAP/OVERVIEW OF MONITORING VISIT

This section provides a recap of the standards monitored during the visit and the recognition of the AAA staff that assisted CDA to accomplish its work.

AAA Administrative Review

Governing Board

Monterey County is located on the central coast of California. Santa Cruz County borders the county to the North, San Benito, Fresno and Kings Counties to the East, San Luis Obispo to the South and the Pacific Ocean to the West. The County is 30 miles wide and 100 miles long, encompassing 3,324 square miles. PSA 32 is a single county Planning and Service Area (PSA), designated as an Area Agency on Aging in 1980.

The Governing Board of the AAA is the Monterey County Board of Supervisors. To help provide administration and oversight of the AAA, the Board appoints a 15-member Advisory Council. Five members of the Council are direct appointments by the Board and the remaining ten members are community at-large appointments recommended by the full Council.

Geri Baucom and Sandi Hartsock, met with Mary Goblirsch, AAA Director, and Supervisor Fernando Armenta, Chair, Board of Supervisors, to determine if the Governing Board, as the policy-making body of the AAA, recognizes and fulfills its roles and responsibilities as required by all regulations, laws, and contracts. Supervisor Armenta has been a member of the Board of Supervisors for seven years. Previously he was on the City Council for nine years. Supervisor Armenta stated the Board is not involved in the day-to-day operations of the AAA, but is kept informed when the Area Plan and the Year End Report are presented for approval. Supervisor Armenta stated that he is amazed at what this agency has accomplished.

Advisory Council

Geri Baucom and Sandi Hartsock met with Robert Petty, Advisory Council Chair, to determine if the Advisory Council is provided the opportunity to (1) advise the AAA on all matters related to the development and administration of the Area Plan and all operations conducted under the plan, and (2) further the AAA's mission of developing a community-based system of care for older persons living within the PSA. Mr. Petty has been a member of the Council for three years and feels the Council has a good working relationship with the AAA and a thorough understanding of senior issues. The Advisory Council is made up of 15 council members, ranging from age 40 to age 70. The Advisory Council members perform annual visits to local service providers which allows them to acknowledge the activities and accomplishments of their service providers and to monitor and evaluate compliance with contract agreements.

Staffing and Organization

Tasha Wilson met with Mary Goblirsch, AAA Director, to determine if the AAA has an adequate number of trained staff to administer programs to older individuals living within the PSA. The AAA restructured in December 2007. The Director now has oversight of the AAA and the division's case management programs and the AAA was able to hire a part-time AAA Planner and part-time Contract Manager. Staff members attend county mandated training throughout the year and also have the opportunity to sign up for career development classes through the Adult Services Training Coordinator. Duty statements and the Personnel Procedures Manual were reviewed and it was determined that personnel practices and procedures have been established and well maintained. The current organizational chart was reviewed and recent changes in staff were accurately reflected on the chart, and the positions identified on the personnel pages of the budgets submitted to CDA matched the AAA's organizational structure.

Procurement/Contract Process

Tasha Wilson met with Ethan Hurley, Contracts Manager, to determine if the AAA established systematic procedures for the award and administration of contracts in the Area Plan and to ensure the AAA awarded contracts through an open and competitive process. All documentation for this standard was reviewed. The latest Request for Proposal (RFP) was issued in February 2006 for Title III B, Title III C-1 and C-2, Title III E, and CBSP. The AAA's RFP contained most of the required elements. There were no grievances or appeals filed as a result of the RFP process.

Area Plan Achievement

Tasha Wilson met with Mary Goblirsch, AAA Director, Marilyn Remark, Program Manager, and Marcie Castro, Management Analyst, to determine if the AAA has a process for developing, monitoring, and tracking the progress of goals and objectives in the current approved Area Plan. Fiscal, program, and data staff collaborate on the development of the area plan at bi-monthly meetings. Goals and objectives are stored in a shared electronic file for continued comments by staff. Once established, the goals and objectives are assigned to committees to monitor progress and report on status to the Advisory Council.

Targeting/Needs Assessment

Tasha Wilson met with Mary Goblirsch, AAA Director, Marilyn Remark, Program Manager, and Marcie Castro, Management Analyst, to determine if the AAA develops outreach methods that target older individuals with the greatest economic or social needs with particular attention to low-income, minority individuals who live within the PSA. A needs assessment was conducted in April 2004. Surveys were distributed both in English and Spanish, and a translator was present at public hearings where community needs were discussed. The AAA also actively participates in community events and health fairs throughout the PSA and coordinates with other organizations such as the Alzheimer's Association and the San Andreas Regional Center to ensure targeted populations are aware of available services. In addition to the typical needs

assessment, the AAA held a Latino Forum to pull together leaders from the community to discuss needs and barriers to services for Hispanic individuals in the PSA.

Community-Based System of Services

Tasha Wilson met with Mary Goblirsch, AAA Director, to discuss steps the AAA has taken to develop a coordinated system of community-based services within the PSA. The AAA is co-located with county departments such as IHSS, MSSP, APS, and SSI Advocacy. Managers from these departments meet monthly ensuring service coordination. This co-location provides the opportunity for the AAA to better serve seniors living within the PSA. In addition, AAA staff and Advisory Council members actively participate in outside committees and events such as the Social Services Transportation Advisory Council, the Caregiver University, and the Aging Forum Series. The AAA is present at health fairs and senior events; and speaks about senior issues on a local radio show.

Management of Service Providers

Sandi Hartsock met with Mary Goblirsch, AAA Director, and Marcie Castro, Management Analyst, to determine if the AAA effectively communicates with, disseminates policies to, and monitors its service providers. The AAA communicates with service providers through email, mandated service provider monthly meetings, the AAA's website, and regular mail. Service providers are monitored on an annual basis.

Data Reporting

Sandi Hartsock and Tasha Wilson met with Becky Cromer, Fiscal Manager to ensure data reporting processes are in place at all levels in order to improve the quality of data reported. The AAA uses an Access database to submit the data to CDA. The data is collected in the intake tool and is then entered into the system. There are no duplicated client counts, and the AAA uses estimates for non-registered clients. The AAA administers training on a one-on-one basis with their service providers. The AAA's data is reported to CDA in a timely manner.

AAA Fiscal Review

Vern Foster met with Veronica Renteria, new AAA Fiscal Officer, and Becky Cromer, Fiscal Manager, to discuss the financial reporting system of the AAA. Mr. Foster spent considerable time with Ms. Renteria providing guidance and technical assistance in an effort to improve her understanding of CDA's fiscal requirements. AAA fiscal staff use the county's Advantage Financial (AFIN) accounting system as well as Excel Spreadsheets for reporting and tracking salaries and wages, expenditures, and funding sources. Ms. Renteria uses the Managing and Reporting Services to Seniors (MARS) system to process and submit monthly reports to CDA. Mr. Foster traced several reported October 2007 expenditures back to originating invoices and supporting documents. AAA staff maintain organized files containing proper supporting documentation for reported expenditures. Mr. Foster also reviewed the service provider contract language for fiscal requirements.

Specific Program Reports—Older Americans Act Programs

Title III B—Supportive Services (General)

Denny Wight met with Marilyn Remark, Program Manager, to review the Title III B Monitoring Tool completed prior to the onsite assessment. The major areas discussed included the development of community-based services, program operations, and administrative programmatic procedures. The AAA maintains proper documentation for its Title III B operations.

Mr. Wight also visited The Alliance on Aging, Inc., with whom the AAA contracts for three Title III B programs: Housing, Employment, and Mental Health. Mr. Wight met with Teresa Sullivan, Executive Director, and individual staff assigned as managers to the three Title III B programs. The operation of the programs was explained and samples of files containing back-up documentation for units of service reported to the AAA were provided.

Title III B—Information and Assistance (I&A)

The AAA contracts with the Alliance on Aging, Inc., for I&A services. Alliance has offices in Monterey and Marina; and serves an average of 475 new clients per month. Outreach for the program is conducted through networking, community education, and distribution of “Que-Pasa?” (a newsletter delivered three times per year to 5,000 individuals and agencies throughout the PSA).

Scott Crackel and Denny Wight, met at the Monterey Alliance office with Teresa Sullivan, Executive Director; Pam Itami, I&A Manager; and Chris Singer and Tim English, I&A Representatives. Also present were Marcie Castro, Management Analyst, and Ethan Hurley, Contracts Manager. The assessment included a review of the I&A monitoring tool and AAA documents related to the provision of I&A services in the county; and observation of staff handling calls for actual I&A clients.

Mr. Crackel and Mr. Wight met with Mary Goblirsch, AAA Director, Marilyn Remark, Program Manager, and Marcie Castro, Management Analyst, to discuss the Disaster Preparedness tool and AAA/Service Provider activities in this area. The AAA is responsible for Disaster Preparedness in the County, but does not have a written manual, and has not conducted documented Disaster Preparedness training for their staff.

Title III C—Elderly Nutrition Program (ENP)

Barbara Estrada R.D., and Margaret Stahler R.D., met with Meredith Manhard, AAA R.D., and Ethan Hurley, Contracts Manager, to assess the ENP. Ms. Estrada and Ms. Stahler reviewed the donation requests, current menus, home-delivered meals (HDM) policies and procedures, annual monitoring reports, quarterly staff training, nutrition education topics, and the CDA monitoring tool.

The AAA contracts with Meals on Wheels Salinas Valley (MOWSV) and Meals on Wheels of the Monterey Peninsula to provide home-delivered meals. Ms. Estrada, Ms. Stahler, and Ms. Manhard met with Janine Robinette, MOWSV Director, to review the systems for meal delivery and the administrative procedures used by the MOWSV.

In the past, MOWSV served hot meals that were cooked by a local caterer. When the caterer could no longer provide the meals, the service provider developed an innovative system to provide frozen meals to the HDM participants. Even though frozen meals can be delivered weekly rather than daily, with the help of many volunteers MOWSV delivers meals twice a week.

Ms. Estrada, Ms. Stahler, and Ms. Manhard enjoyed lunch with the senior participants at the Lupe Firehouse Community Center in Salinas. The lunch provided was an excellent example of an ethnic meal that also included fresh fruits and vegetables. Ms. Estrada, Ms. Stahler, and Ms. Manhard also visited the Greenfield Union School District, Los Ositos congregate nutrition site in Greenfield. This site is a shared community center within an assisted living housing facility. There is a real sense of community among the participants. The meals were prepared by the Greenfield Union School lunch program. Although there was a low minority population being served by the program compared to the area demographics, they were actively recruiting minority attendees.

Title III D—Disease Prevention and Health Promotion

Barbara Estrada R.D., and Margaret Stahler R.D., met with Ethan Hurley, Contracts Manager, to review the Title III D Disease Prevention and Health Promotion monitoring tool. Some Title III D funds are used to provide nutrition education at the meal sites. A significant amount of the funding goes to the Alliance on Aging, Inc., for activities that Mr. Hurley was unable to describe.

Senior Farmers Market Nutrition Program (SFMNP)

Barbara Estrada and Margaret Stahler met with Ethan Hurley, Contracts Manager, to review the SFMNP. During the visit, the monitoring tool and SFMNP forms were reviewed.

Title III E—Family Caregiver Support Program (FCSP)

Joel Weeden met with Mary Goblirsch, AAA Director, and Marilyn Remark, Program Manager, to review the FCSP Program. Mr. Weeden appreciated the AAA's candid approach in assisting with his FCSP review and their willingness to accept guidance on implementation options for strengthening the program and ensuring unpaid family caregivers are recognized as an integral component of the community-based long-term care system. The CDA assessment of AAA procurement and oversight procedures was hindered by the split AAA administrative locations, but Ms. Remark quickly secured

necessary documentation. She also arranged for and accompanied Mr. Weeden on site visit interviews at the following contracted service providers:

- Alzheimer's Association Monterey County Office – Sherry Williams, Regional Director.
- Kinship Center – Carol Bishop, Executive Vice President; Charles Chambers, Family Ties Program Director; and program staff.

In addition to the two site visits, Mr. Weeden received clarifying information from Alliance on Aging, Inc., representatives Teresa Sullivan, Executive Director, and Robert Petty, Director of Community Education. All three FCSP contractors spoke highly of the AAA's understanding on how to advance a rural service delivery within a relatively diverse region. Monterey County's aging services network has in place excellent assets that can be tapped for FCSP-eligible caregivers. However, further AAA stewardship is needed to ensure this existing service network is coordinated into a more cost-effective system of support services where FCSP funds are used as a catalyst for generating additional capacity and filling unmet needs.

Specific Program Reports—Older Californians Act Programs

Health Insurance Counseling and Advocacy Program (HICAP)

Steve Miars met with Ethan Hurley, Contracts Manager, to review the recent HICAP monitoring report prepared by the AAA. Mr. Miars, along with Mr. Hurley, also visited The Alliance on Aging, Inc. with whom the AAA contracts for HICAP services. Mr. Miars met with Teresa Sullivan, Executive Director, Robert Petty, Director of Community Education, and Tamara McKee, HICAP Program Manager. Program operations, reporting, and the contract oversight relationship with the AAA were explained.

Alzheimer's Day Care Resource Center (ADCRC)

Kathleen Hendrickson met with Marcie Castro, Management Analyst, and visited the ADCRC program. Carvette McCalib, Visiting Nurses Association (VNA) Director, and Gayle McConnell, VNA Chief Financial Officer, provided a tour of the VNA, the contracted service provider for ADCRC services.

The ADCRC site is located in Seaside on land originally designated as Fort Ord, a World War II Army base. The ADCRC program operates Monday, Wednesday, and Friday and shares the space with Stroke Handicapped Adult Rehabilitation & Education (S.H.A.R.E.) program also operated by VNA under the direction of Ms. McCalib. Daily attendance at the ADCRC is approximately 12-15 clients. The program operates with the assistance of paid staff and volunteers. The space for the ADCRC is rented by VNA from the Monterey Peninsula Unified School District.

Linkages

Kathleen Hendrickson monitored the direct Linkages program by reviewing the Self Assessment tool completed by Allison Jones, Social Worker Supervisor II, and reviewing two client charts using the Chart Review tool. Ms. Jones is responsible for supervising two full-time care managers. Currently only one position is filled. Ms. Jones recently conducted interviews to hire for the vacant position; however, none of the candidates were appropriate for the position. Because the care manager positions are county positions, Ms. Jones must hire through the civil service process. This may delay filling the position. To remedy this problem, Ms. Jones has hired a former Linkages care manager to work part-time until the position is filled.

Despite the turnover of staff that has occurred in the last two years, the charts were well documented and services were provided in a timely manner. The care managers addressed all the needs of the clients and exceeded the “required contact with the clients” as outlined in the Linkages manual. Ms. Jones and her staff have done an excellent job maintaining the standards of the program despite the turnover.

BEST PRACTICES OR MODELS OF SERVICE DELIVERY

Best practices or models of service delivery discovered during the monitoring of AAAs are being identified by the Department to share with the aging network and other agencies or individuals interested in developing senior services in their community.

Listed below are either best practices or models of service delivery identified during the monitoring visit conducted by the Department and discussed at the Exit Conference. We will place on CDA's website, a reference of your best practices or models of service delivery along with the AAA staff you select to provide guidance to individuals seeking information on specific activities, programs, and services.

Title III E—Family Caregiver Support Program (FCSP)

Empowering Caregivers to be Service Delivery Partners

When providing grandparents and other older relative caregivers an opportunity to voluntarily contribute to the cost of FCSP services, the Family Ties program of Kinship Center in Monterey County allows clients to contribute financially *or as program volunteers*. These FCSP caregiver volunteers assist with program administrative tasks such as newsletter preparation and mailing. They have also proven to be effective fund-raisers for recreational outings that enhance the well-being of both the caregivers and the children receiving their care. In 2007, Family Ties clients generated over \$25,000 through bake sales and other low-key activities. Recreational outings included two busloads traveling to Disneyland.

Title III C—Elderly Nutrition Program (ENP)

Meals on Wheels Pet Food Program

MOWSV, with the support of the local Society for the Prevention of Cruelty to Animals (SPCA), offers a program that provides pet food for seniors who have pets and receive HDMs. The pet food is donated by the SPCA and delivered with the meals to those seniors who need this service. Pet food is provided for all types of pets including turtles, guinea pigs, birds, cats, and dogs.

Meals on Wheels Route Notebook

MOWSV has an organized group of volunteers who deliver the HDMs in the Salinas Valley. Each volunteer receives a binder with information about the route. Included in the binder are important facts concerning HDM participants. Additionally, helpful information about policies and procedures for the meal delivery and emergencies that may occur along the route is part of each driver's delivery information. Organized procedures like this assist in retaining volunteers and helps them feel confident that their work is important and valued.

TECHNICAL ASSISTANCE

One purpose of the monitoring visit is for CDA staff to provide technical assistance to AAA staff on specific program standards that did not rise to the level of a finding that would require formal corrective action. Detailed below is specific technical assistance provided during the monitoring visit.

AAA Administrative Review

Procurement/Contract Process

Part of CDA's RFP monitoring process is to review the responses to and evaluations of the RFP. Because the AAA has gone through a restructure and physically moved to a new building, it took some time to find the responses and evaluations. CDA suggested the AAA keep the responses and evaluations together with the RFP for easy access by both the State and the AAA.

Targeting/Needs Assessment

In an attempt to increase utilization of services by the Hispanic population, the AAA has planned a Latino Forum to bring key community leaders together to discuss needs and barriers to accessing services for the Hispanic population. AAA staff was interested in learning other alternate ways to reach the Hispanic population. CDA staff recommended advertising services on Spanish television networks such as Telemundo and local Spanish radio stations, and making their resource guide available in Spanish.

AAA Fiscal Review

Since the AAA has a new Fiscal Officer, CDA staff explained the AAA expenditure reporting requirements and CDA's Expenditure and Advance Reconciliation spreadsheet which compares expenditures, advances, and budget information for each service category and funding source. In addition, how expenditure adjustments are made to the AAA's reports and how the adjustments would affect the reconciliation process was covered in detail. The AAA currently has no system in place to compare expenditures with the budget at the service category level; therefore, reconciling will be an ongoing challenge for the AAA until they have a system in place.

The AAA currently allocates Title III E administration costs based on 1/12th of the budget. This is an unacceptable allocation method. CDA staff helped revise the administration allocation method, using the budget amount as the basis for allocating administration costs to Title III B, C-1, C-2, and E.

The AAA contracted out fiscal monitoring activities for the most recent cycle. This contracting process did not include entering the schedule of monitoring dates or the monitoring findings data into the AAA's monitoring spreadsheet. CDA staff suggested a

few changes that would be appropriate and beneficial to incorporate into the AAA Fiscal Monitoring process:

1. Add a question to the current monitoring tool to verify the sources of provider match, and ensure that they are allowable sources.
2. Update the "Schedule of Onsite Monitoring Visits to DSES Service Providers" spreadsheet that had been used in prior years to include the previous monitoring dates, and the resulting findings.
3. Create a system to follow-up on any unresolved issues.

The AAA agreed to enter all previous monitoring data into the spreadsheet and to add an additional column to notate whether follow-up was needed.

Specific Program Reports—Older Americans Act Programs

Title III C—Elderly Nutrition Program (ENP)

Communication

AAA staff and the AAA R.D. meet regularly to discuss the issues of the ENP service providers. CDA staff recommended that additional topics be included in these discussions to inform the AAA R.D. about other AAA issues that may affect the ENP. Suggested discussion topics include: timelines for the Area Plan Updates, RFPs and Contracts, and other issues that may impact the nutrition program.

In-Service Training at the Schools

Title 22 requires a minimum of four (4) hours of staff training be provided annually, by service providers, for paid and volunteer food service staff, including congregate and HDM. It has been difficult to provide in-service training at the schools due to insufficient time in the staff schedule. CDA staff recommended the AAA R.D. look into the United States Department of Agriculture (USDA) National School Lunch Program requirements for training. Training already mandated by USDA may satisfy at least a portion of the Title 22 requirements. If the training is not sufficient the AAA may want to consider purchasing food service DVDs that staff can watch at their convenience.

Frozen Meals

MOWSV provides pre-boxed frozen meals complete with a frozen Dairy Drink. The Dairy Drink contains additional whey milk protein to boost the protein content of the milk along with two artificial sweeteners and stabilizers. When defrosted, the product was somewhat coagulated and had a unique sweet taste. CDA staff suggested the AAA work with the purveyor of the Dairy Drink to find a replacement for this product. The menus may meet the 2/3 DRI requirement without the additional protein added to the Dairy Drink. Switching back to low-fat milk may be a simple solution.

Title III E—Family Caregiver Support Program (FCSP)

Offer Support to All FCSP-Eligible Caregivers

Through its RFP procurement process, the AAA states FCSP funds may be used to serve all FCSP-eligible caregivers. However, FCSP-funded service providers are limiting their grants to supplement services for existing clientele. For example, both the Alzheimer's Association and Health Projects Center state in their public information materials that they serve caregivers of those with Alzheimer's disease, mental impairments, or other related disorders. Legal Services for Seniors and the Kinship Center limit their FCSP services only to grandparents and other older relative caregivers. The AAA was advised to use the RFP and contract renegotiation procurement steps to generate service capacity to help those caring for elders with physical frailties, but without mental limitations.

Provide Multifaceted Systems of Caregiver Support Services

The federal FCSP funding share is to be used by AAAs and their contracted service providers to provide multifaceted systems of support services. In Monterey County, multifaceted support is available on a limited basis to targeted groups served by the Alzheimer's Association, Health Projects Center, and Kinship Center. While the Alliance on Aging, Inc., may serve all FCSP-eligible caregivers, it is funded to provide only Caregiver I&A and Caregiver Training. The AAA was advised on possible ways to rebalance its FCSP service priorities to place greater emphasis on caregiver assessment, counseling, and support groups; thereby, diminishing the negative consequences associated with unpaid caregiving, such as stress, physical strain, and depression.

Coordinate Kinship Support Service Program (KSSP) and FCSP Systems

The Family Ties program of the Kinship Center relies primarily on KSSP funds awarded to Monterey County Department of Social and Employment Services by the California Department of Social Services. KSSP is a county and Kinship Center partnership to provide early intervention comprehensive support for kinship care. However, KSSP grants are insufficient in meeting all needs. Therefore, the AAA was advised to use FCSP funds as a catalyst for generating capacity for activities not funded by KSSP, such as legal assistance, temporary respite for grandparents, and limited emergency case/material aid.

Enhance Grandparent Guardian Petition Legal Assistance

The conservator court petition process for a guardianship is complex and time consuming. Grandparents and other older relative caregivers can easily become frustrated, particularly if they are already overwhelmed with care responsibilities or face language barriers. However, these court filings do not require legal representation. Both the Kinship Center and Legal Services for Seniors currently use FCSP funds to offer legal representation to these grandparents. The AAA was encouraged to contact Bet Tzedek Legal Services in Los Angeles for information about how the FCSP contractor has partnered with the courts to provide regularly scheduled workshops on

how to file for guardianships. The courts serve as the referral source and provide the meeting space. FCSP-eligible clients receive an overview of the conservator role and court process, learn how to prepare appropriate legal documents, and have access to ongoing technical assistance. The caregiver training approach empowers caregivers to address a basic legal issue on their own and reduces FCSP-funded staff time otherwise spent in one-on-one meetings.

Reconsider FCSP Legal Services Strategy

The AAA awards FCSP funds to Legal Services for Seniors (LSS) and the Kinship Center for the same service: Caregiver Legal Assistance specifically for guardianships. However, Kinship Center passes its “legal assistance” funds on to LSS to augment their funding in exchange for priority consideration of Kinship Center referrals. The AAA was advised to reconsider the fiscal aspects of this legal services strategy, and ensure contractual and vendor agreements meet efficiency and effectiveness expectations.

Deliver FCSP Services from a Caregiver Perspective

The AAA is unique in its FCSP funding of Home Safety Supplemental Services for grandparents and other older relative caregivers. During the site visit, the Kinship Center discussed the use of FCSP funds within this service category. The service provider's example focused on installation of grab bars in order to prevent a frail elder from falling. The AAA was advised to ensure that its service providers document in their caregiver client records that FCSP Supplemental Services funding was used in ways that facilitate and enhance the caregiving role. For example, grab bars are installed around the bathtub so that the older caregiver may safely assist a toddler in bathing.

Provide FCSP Respite Care in Accordance with OAA Expectations

Health Projects Center is the AAA's sole Respite Care service provider for family caregivers of older adults. This agency also sponsors the Del Mar Caregiver Resource Center (CRC), which is part of a statewide system established by the California Department of Mental Health to support those caring for individuals with brain impairments. CRC respite is provided via a pre-established set amount offered on a “first come, first serve” waiting list basis and tied to sliding scale fees. The AAA was asked to review Health Projects Center program procedures to ensure it understands the difference between the two respite programs; and ensure FCSP Respite Care is provided on a timely basis and at an adequate level in order to hold together fragile unpaid caregiver arrangements that are at risk of collapse.

Adjust to FCSP Client Eligibility and Service Priority Revisions

The AAA was advised that a CDA program memo is forthcoming that will summarize 2006 OAA reauthorization revisions for client eligibility and service priorities. Eligibility rules were expanded to serve: 1) caregivers of an individual of any age with Alzheimer's disease or related disorder; 2) grandparents or other relative caregivers who are 55 years of age or older; and 3) grandparents or other relative caregivers of a child of any age with a disability. Service priorities were refocused towards the older individual age

60 years of age or older. Also, family caregivers hired as IHSS workers are eligible to receive FCSP services (including respite) for caregiving needs outside of their IHSS paid role. The Area Plan Contract between CDA and the local AAA states that an individual's receipt of services under IHSS shall not be the sole cause of denial of any services provided by the AAA or its service providers. Therefore, Health Projects Center should delete the following statement from its website: "If you already receive assistance from another program such as IHSS, we cannot cover such services as respite..."

Specific Program Reports—Older Californians Act Programs

Health Insurance Counseling and Advocacy Program (HICAP)

CDA staff discussed HICAP data collection and reporting and the importance of being informed and aware of the data reporting requirements. CDA staff highly encouraged the AAA Contracts Manager to attend the HICAP Data Training to be conducted by CDA in San Mateo, May 19 and 20, 2008.

FINDINGS REQUIRING CORRECTIVE ACTION

This report details the specific findings that led to the corrective actions specified in the Official Notice of Required Corrective Actions presented to AAA staff at the January 17, 2008, exit conference conducted by the Department. A response is due to the Department within 30 days from the date of the letter transmitting this report.

AAA Administrative Review

Advisory Council

California Code of Regulations (CCR) Section 7302(a)(12) states that the composition of the Advisory Council shall include minority individuals in proportion to the percent of the population in the community who are eligible to participate in the program. The Advisory Council lacks sufficient representation from the Hispanic and Asian/Pacific Islander communities. This leaves the Council with reduced representation on issues that impacts individuals in these ethnic groups.

Corrective Action: Recruit Advisory Council members that represent the ethnic composition of the community with particular emphasis on recruiting Hispanic and Asian/Pacific Islander individuals. (Repeat finding, March 2003)

The Monterey County Advisory Council bylaws contained the required rules of removal procedures, but were missing the appeals process which would allow for due process should a member feel the basis for their removal was unfair.

Corrective Action: Amend the Advisory Council Bylaws to add an appeals process to the Rules of Removal procedures. (Repeat finding, March 2001 and March 2003)

Procurement Process

Section I—RFP Process

CCR Section 7354(b)(3) specifies the RFP must include an estimate of the funding available and Section 7354(b)(8) specifies the RFP must include an estimate of the minimum number of units of service to be provided and the definitions of those unit measurements. CDA staff reviewed the AAA's latest RFP and determined it did not include an estimate of the funding available or minimum number of units of service.

Corrective Action: Ensure the RFP specifies an estimate of available funding and minimum service unit performance expectations for each service category to be funded.

Section II—Contract Process

CDA's Standard Agreement, Exhibit A, Article I (10) defines Program Income as revenue generated by the Contractor or subcontractor from contract-supported activities. Program income is:

- a. Voluntary contributions received from a participant or responsible party as a result of services.
- b. Income from usage or rental fees of real or personal property acquired with grant funds or funds provided under this Agreement.
- c. Royalties received on patents and copyrights from contract-supported activities.
- d. Proceeds from sale of items fabricated under a contract agreement.

In the budget attached to the AAA's service provider contract, "Interest on Savings Accounts" was incorrectly listed as Program Income in the "Funding Source Summary."

Corrective Action: Ensure the definition for program income found in service provider budgets does not include "Interest on savings accounts".

CDA's Standard Agreement, Exhibit D, Article XI (D) states the service provider shall provide a certificate evidencing that insurance coverage is in effect at all times during the term of the agreement. CDA staff discovered the service provider files did not contain Certificates of Insurance. The AAA stated the Certificates of Insurance are kept in another location; however, a copy of the certificates should be maintained in the service provider files.

Corrective Action: Maintain current Certificates of Insurance in the AAA's service provider files.

Management of Service Providers

The AAA's monitoring tool must include the correct requirements for Title III eligible clients. During the onsite monitoring assessment, CDA staff discovered numerous documents from service providers, including the Senior Employment Program and the Shared Housing Program, that referenced eligible clients as 55 years and older. OAA Programs are required to serve "older individuals". As specified in the OAA, Section 102(a)(40), the term "older individual" is defined as an individual who is 60 years of age or older.

45 Code of Federal Regulations (CFR) 1321.67(2)(c) and (d) states in part that each service provider may develop a suggested contribution schedule for services provided.

The service provider shall consider the income ranges of older persons in the community and the provider's other sources of income. However, means tests may not be used for any services and a service provider may not deny any older person a service because the older person will not or cannot contribute to the cost of the service. CDA staff reviewed monitoring tools that include the responses from the service providers. S.H.A.R.E. and Salinas Adult Day Services Center referenced charging a fee for services. The Title III B Shared Housing Program referenced a \$25 processing fee.

Corrective Action: Expand onsite program monitoring to include verification that only eligible clients are served and voluntary contribution procedures meet all CDA requirements.

Data

CDA's Standard Agreement, Exhibit E, Article II E states the Contractor shall verify the accuracy of the data submitted to the Department for inclusion in the reports to the State Executive Branch, Legislative Branch, and the federal government; and E(2)(b) states the AAA Director shall review and approve the verification forms by signing and dating the bottom of both forms. CDA staff discovered that program staff and the Director are not reviewing or verifying the data prior to submitting to CDA. The AAA program staff should review the data prior to submission to CDA; and the Director must sign and date the SPR/CBSP verification forms and submit to CDA.

Corrective Action: Ensure NAPIS data are verified for accuracy by responsible program staff prior to submission to CDA.

AAA Fiscal Review

Financial Reporting

AAAs must establish and maintain a financial reporting system that reflects accurate, current, and complete disclosure of the financial activities of the AAA and its service providers pursuant to 45 CFR 92.20(b)(1). The AAA has no method of tracking expenditures by service category when the same services are provided by multiple providers. There is no system in place to ensure expenditures do not exceed service category budget limits.

Corrective Action: Develop a system that tracks expenditures by service category and funding source and compares year-to-date expenditures to budget amounts for each service category.

According to 45 CFR 92.20(b)(2), the AAA must maintain records which adequately identify the source and application of funds provided for financially-assisted activities. The AAA has no method of tracking expenditures for State and federal funding sources, by budgeted service category. On the service provider invoices, State and federal costs are combined and reported as "AAA Claim" costs. When reporting to CDA, the AAA

distributes and reports these costs as State and federal without referring to the budget. For the October 2007 expenditure report, Personal Care and Homemaker costs were reported as federal while the AAA's budget shows Personal Care and Homemaker budgeted under State funds only.

Corrective Action: Report expenditures that are in agreement with budgeted funding sources.

According to 45 CFR 92.20(b)(6), accounting records must be supported by such source documentation as cancelled checks, paid bills, payrolls, time and attendance records, and contract and sub-grant award documents. The AAA has a Vendor Agreement with Maxim to provide Homemaker and Personal Care services. When reviewing the vendor invoices, there was no documentation confirming delivery of services.

Corrective Action: Implement a system to ensure Vendor Agreement invoiced services have been delivered to the client prior to issuing payment.

AAA fiscal reports continue to be inconsistent and submitted late. Although the AAA has shown improvement since the last monitoring visit, there is no record of any consistent period where timely submissions have occurred. AAAs must establish and maintain a financial reporting system that reflects accurate, current, and complete disclosure of the financial activities of the AAA and its service providers pursuant to 45 CFR 92.20(b)(1).

Corrective Action: Submit all fiscal documents by required due dates.
(Repeat finding, March 2003)

The AAA has not returned contracts to CDA with all required documents in a timely manner. This finding pertains not only to the current year, but has been a problem for at least four years. The current Area Plan Contract for the period July 2007 to June 2008 was not fully executed until November 14, 2007. As a result, CDA could not advance FY 2007/08 Area Plan Contract funds to the AAA until December 2007. CCR Section 7364(c) states in part, both ongoing and new contract awards shall be in full contract compliance within 120 days of the beginning date of the contract.

Corrective Action: Ensure the Standard Agreements with CDA are returned with all required documents in a timely manner.

Allowable Costs

According to 45 CFR 92.20(b)(5), applicable OMB cost principles, program regulations, and standard agreement terms will be followed in determining the reasonableness, allowability, and allocability of costs. Currently, there is no system in place for program

staff to review service provider budgets for reasonableness, allowability, and allocability of costs according to fiscal staff. Program staff should work closely with fiscal staff during Area Plan and HICAP budget development, as well as during revisions.

Corrective Action: Ensure service provider budgets are reviewed and approved by program staff.

Corrective Action: Ensure program staff is involved in the development of the Area Plan Budget, HICAP Budget, and all budget revisions.

Internal Control

CDA's Standard Agreement, Exhibit D, Article VII(F)(7) states in part that the Contractor shall keep track of property purchased with Contract funds, whether capitalized or not. The Contractor shall maintain and submit to the Department annually with the Closeout, a current inventory of property furnished or purchased by either the Contractor or the subcontractor with funds awarded under the terms of this agreement or any predecessor agreement for the same purpose. The AAA did not perform an annual inventory during FY 2006/07 and the inventory list was not current.

Corrective Action: Ensure physical inventories are conducted and property records are updated annually.

Specific Program Reports—Older Americans Act Programs

Title III B—Supportive Services (General)

The Title III B funded Senior Employment Program and Shared Housing Program are serving clients 55 years of age and older. OAA programs are required to serve "older individuals". As specified in the OAA Section 102(a)(40) the term "older individual is defined as an "individual who is 60 years of age or older".

Corrective Action: Ensure the Title III B funded Senior Employment Program and Shared Housing Program are not serving clients under 60 years of age.

According to Section 315(b)(1) of the OAA, voluntary contributions shall be allowed and may be solicited for all services as long as the method of solicitation is non-coercive. CDA staff reviewed the February 13, 2007, Alliance on Aging, Inc., Program Onsite Monitoring Report and found the Home Share Program has been requesting a \$25 processing fee from clients since May 2006.

Corrective Action: Ensure service providers discontinue the practice of charging participants a processing fee for the Title III B funded Shared Housing Program.

According to Section 315(b)(1) of the OAA, voluntary contributions shall be allowed and may be solicited for all services as long as the method of solicitation is non-coercive. CDA staff reviewed the contract with Salinas Adult School and discovered Salinas Adult School included the statement “fee for services” in a section that asks the subcontractor to describe sources of program income.

Corrective Action: Ensure S.H.A.R.E. and Salinas Adult Day Services Center programs do not require fee for service for Title III B clients.

Title III B—Information and Assistance (I&A)

The I&A program does not have a written training plan to ensure staff are aware of their job duties as required in CCR Section 7545 and CCR Section 7547. The AAA should develop a training plan that includes, at a minimum, the following components:

- Older Americans Act and Older Californian’s Act;
- Title 22 Regulations pertaining to I&A;
- Role, purpose, and function of the I&A program and the relationship to the administrative structure of the AAA;
- Procedure to identify and access local resources;
- Techniques to obtain vital information from older individuals who require emergency assistance;
- Procedures to handle emergencies such as medical and natural disasters;
- Copy of the NASUA Support Center and Online Guide for Developing Aging Competencies for Information & Referral/Assistance Specialists;
- Procedures on how data related to service provision is tracked, recorded, and reported;
- NAPIS definition of an I&A Service Unit;
- Importance and purpose of completing follow-ups, to the maximum extent practicable, when linking callers to services; and
- Timeline for presentation of the plan/program manual to I&A staff members.

Corrective Action: Develop a standardized I&A written training plan to be implemented throughout the PSA, and submit a copy to CDA by June 30, 2008. (Repeat finding, March 2003)

CCR Section 7537 specifies that I&A service providers shall follow-up on each referral to ascertain if the older individual’s service needs were met. The I&A service provider is not consistently completing follow-ups and documenting outcomes of referrals when clients are linked to services.

Corrective Action: Develop and implement a standardized procedure to ensure completion of follow-ups and documentation of outcomes for each client that is referred to a needed service, within 30 days of the referral, to ascertain if the individual’s service needs were met.

The AAA does not have a written disaster plan as required in Section 306 of the OAA. In addition, I&A staff members and volunteers who work directly with older individuals have not received training on their roles and responsibilities during and following a disaster as required in CCR Sections 7529 and 7547.

Corrective Action: Develop written procedures for I&A staff to assist older individuals residing within the PSA during natural disasters, such as earthquakes or floods. (Repeat finding, March 2003)

Corrective Action: Ensure paid and volunteer I&A staff working directly with older individuals are trained on disaster procedures.

Title III C—Elderly Nutrition Program (ENP)

CCR Section 7634.3(c) states in part that the Registered Dietitian (R.D.) shall participate in the Area Plan development related to nutrition services. The AAA R.D. has not been included in the Area Plan development and update process on issues that relate to the ENP.

Corrective Action: Ensure the AAA R.D. participates in the Area Plan development and update process related to ENP issues.

CCR Section 7634.3(b) specifies that the R.D. shall participate in developing and evaluating the AAA RFP concerning nutrition services. The AAA R.D. has not been included in the RFP development and evaluation process.

Corrective Action: Utilize the expertise of the AAA R.D. in developing the RFP and in evaluating the proposals for the ENP.

Section 315(b)(4) of the OAA requires AAAs to ensure its service providers provide each participant with an opportunity to contribute to the cost of a service but clearly inform each participant there is no obligation to contribute and that the contribution is purely voluntary. Further, Section 315(b)(3) of the OAA prohibits AAAs and service providers from means testing for any service for which contributions are accepted or deny services to any individual who does not contribute to the cost of the service. Meals on Wheels Salinas Valley uses an accounts receivable system and sends an invoice to recipients for a negotiated meal donation rate, based on the client's income. At the Lupe Firehouse Congregate Meal Site, meal tickets are used to track the people who wish to receive a lunch. Providing meal tickets gives the appearance that "payment" is required, and there is no sign to inform the participant that there is no obligation to contribute and that the contribution is purely voluntary.

Corrective Action: Ensure that all requests for donations include a statement to clearly inform each participant there is no obligation to contribute and the contribution is purely voluntary.

Corrective Action: Ensure service providers discontinue the practice of negotiating meal donation rates based on participant income and sending monthly statements requiring payment for home-delivered meals.

Corrective Action: Ensure the service provider discontinues the use of meal tickets at the Lupe Firehouse and Meals on Wheels of Monterey Peninsula congregate meal sites.

CCR Section 7250(b)(4) requires contracts at a minimum to include all of the applicable information specified in 45 CFR 92.36(i). The service provider contracts do not contain sufficient detail to delineate the scope of responsibilities and operational requirements of the program. The basic template used in the contracts with each service provider is different. A consistent template may clarify the expectations for the programs.

Corrective Action: Ensure the contracts for ENP service providers contain sufficient detail to delineate the specific scope of responsibilities and operational requirements of the program.

CCR Section 7638.11(c) specifies that nutrition education services shall be based on the particular need of congregate and home-delivered meal participants. This section further specifies that an annual needs assessment shall be performed by the nutrition service provider to make this determination. Nutrition education needs assessments were not performed by the service providers.

Corrective Action: Ensure service providers conduct an annual nutrition education needs assessment for all participating seniors.

CCR Section 7636.1(b)(7) states that a nutrition screening of congregate and home-delivered meal participants must be conducted in accordance with federal requirements found in Section 339 of the OAA. The contracts with Greenfield Union School District states that Nutrition Risk screening shall be performed one time at intake. The Nutrition Risk Screening Tool (Determine Checklist) is designed to be repeated annually.

Corrective Action: Ensure the contract with Greenfield Unified School District correctly states that nutrition risk screening shall be performed annually.

CCR Section 7638.5(a)(1)(B) states that if the program provides two (2) meals per day, a minimum of two thirds (2/3) of the DRIs should be provided. Program Memo (PM) 07-13(P) provides detailed information on the amount of fiber to be provided in each meal (a minimum of 7 Grams). Meals on Wheels Salinas Valley meals did not meet the DRI requirements for fiber.

Corrective Action: Ensure the combination of breakfast and lunch meals provided to home-delivered meal participants meet at least 2/3 of the Dietary Reference Intake requirements for fiber and protein.

CCR Section 7638.1(a)(1) requires each congregate meal provider to include procedures for obtaining the views of participants about the services received. The AAA did not have a written policy and procedure for obtaining feedback from the participants about the services provided.

Corrective Action: Ensure that each service provider has a formal policy and mechanism for obtaining feedback from participants about the services that are provided.

CCR Section 7638.5(c) states in part that food substitutions to meals originally planned must meet the requirements of this section and be approved by a R.D. ENP service providers do not have a mechanism in place for a R.D. to approve food substitutions prior to service.

Corrective Action: Ensure a R.D. approves substitutions that meet menu requirements prior to meal service.

CCR Section 7638.5(b) requires a meal analysis, approved by a R.D., to be done to ensure compliance with the DRIs and The Dietary Guidelines for Americans (2005). Some of the menus include meals that do not meet these requirements and therefore are not eligible for NSIP reimbursement. Not reviewing menus could lead to inaccurate reporting.

Corrective Action: Ensure the AAA R.D. reviews and approves all nutrition service provider menus prior to meal service.

Senior Farmers Market Nutrition Program (SFMNP)

The SFMNP Tool Kit requires the collection of participants' race and ethnicity data. The service provider developed a coupon issuance log that does not include all of the required race and ethnicity data. The required ethnicity key includes 21 descriptive terms; however, the service provider only collected information on 7 descriptive terms.

Corrective Action: Ensure the intake form collects all required ethnicities-data identified on the "Ethnicity and Race Key" in the Senior Farmers Market Nutrition Program Tool Kit.

Title III E—Family Caregiver Support Program (FCSP)

Section 302(1) of the OAA requires that all Title III supportive services (including FCSP) be provided in a manner that facilitates accessibility to, and utilization of, the services provided within the AAA's service area. However, FCSP funded services were not

identified on the websites or in the service brochures for the AAA's contracted FCSP service providers. For example, Health Projects Center does not list FCSP as one of its programs and there is no mention of the FCSP-funded Caregiver Transportation service. Alliance on Aging, Inc., is funded to provide training for FCSP-eligible, unpaid caregivers, but has listed the service under the Senior Employment program and does not identify the service in the Caregiver Resources section of its "Guide to Resources for seniors." The Family Ties program of Kinship Center states in its website-based Frequently Asked Questions that it does not have funds for emergency needs but is funded by the AAA to provide this Supplemental Service.

Corrective Action: Require public information disseminated by a Title III E funded service provider identifies the availability of these services and applicable eligibility criteria.

Section 315(b)(3) of the OAA prohibits the AAA and its service providers from using a means test for any OAA service, including FCSP, and services cannot be denied to any individual that does not contribute to the cost of a service. Health Projects Center (HPC) states in its FCSP proposal that *"services are offered for free or on a sliding-scale basis, depending on the client's ability to pay. If the client is able to pay something toward services, a co-pay amount is established, and the client is invoiced for their portion."* The HPC website listing of free and low-cost services specifies that respite is "low-cost (with a sliding scale co-pay)."

Corrective Action: Require the Health Projects Center to replace Title III E client fee generating policies with opportunities to voluntarily contribute to the cost of Title III E services.

Section 373(a) of the OAA specifies that family caregivers are eligible for Title III E support services. Section 302(3) defines the term "family caregiver" to be an *informal* provider of care, which means without pay. An IHSS or private-pay care worker is considered a formal provider. The Alliance on Aging, Inc., proposal for Caregiver Training targets IHSS workers, but indicates non-IHSS workers who are caregivers or will become caregivers will also be served. Since this Title III E service is offered through the agency's Senior Employment Services program, the term "caregivers" may apply to paid care workers. Service provider staff state those family caregivers that are non-paid care providers may also participate in the training. However, Title III E funds are limited to assisting only non-paid FCSP-eligible caregivers. Federal cost principles allow programs to share costs with other related activities (i.e., IHSS care worker training) as long as each program pays its fair share of costs in accordance with the benefits received.

Corrective Action: Ensure the allocation of Title III E costs reflects the level of utilization by eligible, unpaid caregivers when conducting joint trainings with paid care workers.

Section 373(e)(2) of the OAA requires that data is collected and maintained to evaluate and compare the effectiveness of services provided with Title III E funding. AAAs must validate this data to ensure delivered caregiver benefits correlate with FCSP-funded services. AAA Quarterly Service and Annual Profile reports contain inaccurate data. For example, the July-September 2007 report identified that 512 Caregiver Information and Assistance contacts resulted in only 27 persons served. The 2006/07 Annual Profile Report identified 354 caregivers serving only 74 care receivers. These care receivers included 111 children and 107 care receivers identified as at risk by Adult Protective Services. The Alzheimer's Association provides information only on the caregiver. Alliance on Aging, Inc., reports the provision of FCSP Caregiver Support Group services but is not funded to provide this service. Consequently, current AAA performance data submitted to CDA has been incomplete and does not correlate to actual FCSP expenditures.

Corrective Action: Validate Title III E service provider performance data, compare against contract expectations, and resolve inconsistencies before submission to CDA.

CDA's Standard Agreement requires AAAs to annually monitor and evaluate service providers for performance, which further ensures compliance with Section 372(e)(2) of the OAA oversight expectations. As stated in Section 306(a)(13), these onsite assessments help AAAs maintain the integrity and public purpose of services provided. At a minimum, AAAs must verify FCSP client eligibility, service quality, accuracy of data, and maintenance of effort requirements specified in Section 374 of the OAA. When conducting onsite assessments of those service providers with multiple AAA contracts, the AAA did not assure that FCSP expenditures met OAA requirements for client eligibility, appropriate support services, and protection of the maintenance of effort where Title III E funds are expended in correlation with collaborative service activities. The AAA's monitoring tool did not provide for evaluation of client eligibility and data validation. A completed AAA monitoring tool did distinguish the multiple contracted activities of the Alliance on Aging, Inc., but left out FCSP. As a result, the AAA may be submitting data and cost reports to CDA that do not correspond to eligible FCSP services.

Corrective Action: Expand annual onsite assessments of service providers to ensure Title III E contract requirements are being met where Title III E funding is expended within collaborative service delivery systems.

Specific Program Reports—Older Californians Act Programs

Alzheimer's Day Care Resource Center (ADCRC)

The contracted ADCRC was last monitored on January 16, 2007 by an AAA staff member using a standard monitoring tool. The required monitoring tool for the ADCRC

program is the Core Elements tool in the ADCRC manual. The requirement to use the Core Elements monitoring tool was established by an agreement between CDA and the California Association of Area Agencies on Aging (C4A).

Corrective Action: Ensure the ADCRC Core Elements monitoring tool is used to monitor the ADCRC program.

The ADCRC RFP did not include the required elements for the operation of an ADCRC site. The RFP did not mention the ADCRC manual or the requirement to follow the manual when establishing and operating a program per PM 98-21(P), Model ADCRC Program Request for Proposals, dated August 7, 1998.

Corrective Action: Ensure the RFP includes language requiring the provider to follow the requirements of the ADCRC manual.

Corrective Action: Include the following requirements in the ADCRC RFP:

- Days and hours of operation (3 days a week, 5 hours per day),
- Staffing ratio (1 staff person to 5 participants),
- Providing a noon meal which is one third of the recommended daily allowance for older persons; and
- Licensed as an Adult Day Care by the California Department of Social Services or an Adult Day Health Care by the California Department of Health Services.

Linkages

Section 4.A.1 of the Linkages Program Manual allows sites a caseload variance of 20% of the required monthly caseload count of 100. A review of the Linkages Self Assessment tool indicated that the Active Monthly Caseload had fallen below the required 80 clients for nine months during the last calendar year (January 2007-December 2007). If the Active Monthly Caseload falls below the 20 percent allowance for two consecutive months, a written Corrective Action Plan must be submitted to CDA. Although Ms. Jones provided the AAA director with a Corrective Action Plan, the Plan was not sent to CDA.

Corrective Action: Ensure that a Corrective Action Plan is provided to CDA when the active monthly caseload falls below the 20 percent allowance for two consecutive months.

Corrective Action: Provide a Corrective Action Plan to CDA by March 1, 2008 that addresses the current caseload which is below the required 20 percent allowance.

Health Insurance Counseling and Advocacy Program (HICAP)

In 1999, a joint work group representing C4A, CDA, and the California HICAP Association (currently know as the California Health Advocates) agreed to and compiled 34 program related items into a HICAP Monitoring Instrument. These items were to be used or incorporated into any tool used by the AAA to perform annual HICAP program monitoring. After review of the AAA's monitoring reports of the HICAP service provider for FY 2004/05 through FY 2007/08, CDA staff found that the monitoring tool used did not contain the required HICAP Core Elements.

Corrective Action: Ensure the HICAP Core Elements monitoring tool is used to monitor the HICAP program.

CDA's HICAP Standard Agreement, Exhibits A through E, contains required provisions for inclusion in the AAA's terms and conditions with a local service provider performing HICAP Services.

Corrective Action: Ensure all applicable provisions required within the CDA HICAP Standard Agreement are included in the HICAP service provider contract.